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IN THE UNITED STATES DISTRICT COURT COURT 3 PM 1:17
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) SUPERSEDING INDICTMENT
)
Plaintiff,) JUDGE CHRISTOPHER A. BOYKO
)
v.)
) CASE NO. 1:18CR408
JOSEPH R. HURLEY,) Title 18, United States Code,
) Sections 2251(a), 2252(a)(2), and
Defendant.) 2252(a)(4)(B)

COUNT 1
(Sexual Exploitation of a Child, 18 U.S.C. § 2251(a))

The Grand Jury charges:

On or about March 24, 2013, in the Northern District of Ohio, Eastern Division,
Defendant JOSEPH R. HURLEY did use, persuade, induce, entice and coerce a minor, whose
identity is known to the grand jury, to engage in sexually explicit conduct, as defined in Title 18,
United States Code, Section 2256(2), for the purpose of producing a visual depiction of such
conduct, and such visual depiction was produced using materials that had been mailed, shipped,
and transported in interstate and foreign commerce, in violation of Title 18, United States Code,
Section 2251(a).

COUNT 2
(Receipt Visual Depictions of Real Minors Engaged in Sexually Explicit Conduct,
18 U.S.C. § 2252(a)(2))

The Grand Jury further charges:

From on or about December 26, 2005 through on or about August 20, 2013, in the
Northern District of Ohio, Eastern Division, and elsewhere, Defendant JOSEPH R. HURLEY,
did knowingly receive numerous visual depictions of real minors engaged in sexually explicit

conduct, as defined in Title 18, United States Code, Section 2256(2), which visual depictions had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT 3

(Possession of Visual Depictions of Real Minor Engaged in Sexually Explicit Conduct,
18 U.S.C. § 2252(a)(4)(B))

The Grand Jury further charges:

On or about March 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant JOSEPH R. HURLEY, did knowingly possess two computer hard drives, each of which contained visual depictions of a minor, whose identity is known to the grand jury, engaged in sexually explicit conduct, and which visual depictions were produced using materials which had been mailed, shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252(a)(4)(B).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.